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Vanadium & Titanium Company, Ltd., Pangang Group Titanium Industry
Company, Ltd., and Pangang Group International Economic & Trading Company*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:11-CR-00573-07-10 JSW
)	
Plaintiff,)	
)	JOINT STATUS REPORT
v.)	
)	
PANGANG GROUP COMPANY, LTD.;)	
PANGANG GROUP STEEL VANADIUM &)	
TITANIUM COMPANY, LTD.; PANGANG)	
GROUP TITANIUM INDUSTRY)	
COMPANY, LTD; and PANGANG GROUP)	
INTERNATIONAL ECONOMIC &)	
TRADING COMPANY,)	
)	
Defendants.)	
)	

The parties have met and conferred regarding proposed trial dates and pretrial deadlines after the Mandate issued from the Ninth Circuit Court of Appeals (Dkt. No. 50, Case No. 19-10306). The parties jointly propose the following dates:

1. Tuesday, March 15, 2021:
 - a. Government to disclose Trial Witnesses and Exhibits;
 - b. Government disclosure of *Jencks* and *Giglio* Materials; and
 - c. Government Disclosure of Experts and Expert Reports.

1 2. Friday, April 15, 2022: Defense Disclosure of Experts and Expert Reports.

2 3. Friday, April 29, 2022: *Daubert* and *In Limine* Motions.

3 4. Friday, May 13, 2022: *Daubert* and *In Limine* Responses.

4 5. Friday, May 27, 2022: *Daubert* Replies (no *In Limine* Replies).

5 6. Friday, June 6, 2021: Pretrial Filings.

6 7. Monday, June 20, 2022 2:00 p.m.: Final Pretrial Conference.

7 8. Monday, July 11, 2022: Jury Selection and Trial.

8 With respect to the proposed July 11, 2022 trial date, the parties note for the Court's advance
9 consideration two points that influenced this proposal: (i) lead counsel for the government will be on
10 extended personal leave from late December 2021 until at least late March 2022, and (ii) the case agent is
11 expected to be in trial for approximately six weeks beginning February 14, 2022. Based on those factors,
12 and, in addition, the considerable difficulties for the defense in preparing for trial during the pandemic
13 given the location of the defendants, the defense will stipulate to an appropriate Speedy Trial exclusion.
14 The proposed July 11 trial date will accommodate the aforesaid periods of unavailability and trial
15 preparation challenges.

16 The parties specifically reserve the following issues, which could not be resolved during the meet-
17 and-confer and will be the subject of further meet and confer efforts: When the Defense must produce an
18 Exhibit List, Witness List, and Rule 16(b) material and 26.2 witness statements, and whether the Defense
19 deadlines should fall later than the Government's pretrial deadlines.

20 The parties will appear as ordered at the next status conference, currently scheduled for October
21 5, 2021, to address pretrial and trial dates and any other matters.

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STEPHANIE M. HINDS
Acting United States Attorney

September 28, 2021.

/s/ Colin C. Sampson
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September 28, 2021.

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